

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION FOR
PROTECTIVE ORDER OVER CERTAIN
EXHIBITS TO THE STROZ DUE
DILIGENCE REPORT AND THE
DECLARATION OF PATRICK
SCHMIDT IN SUPPORT THERETO**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal its Motion for Protective Order Certain Exhibits to the Stroz Due Diligence Report (“Motion”) and the Declaration of Patrick Schmidt in Support and Exhibit A thereto (“Schmidt Declaration”). Specifically, Waymo requests an order granting leave to file under seal the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Motion	Entire Document	Defendants
Schmidt Declaration and Exhibit A thereto	Entire Document	Defendants

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. DEFENDANTS’ CONFIDENTIAL INFORMATION

Waymo seeks to seal the Motion and the Schmidt Declaration as identified in the table above, because Waymo believes it also contains information considered confidential or non-public by Defendants or by certain third parties. (Schmidt Decl. ¶ 4.) Waymo expects Defendants to file declarations in accordance with the Local Rules. (*Id.*)

//

//

//

//

//

//

//

//

//

1 **III. CONCLUSION**

2 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
3 above listed documents accompany this Administrative Motion. For the foregoing reasons,
4 Waymo respectfully requests that the Court grant Waymo's administrative motion to file under
5 seal.

6
7 DATED: September 19, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

8
9 By /s/ Charles Verhoeven

Charles Verhoeven
Attorneys for WAYMO LLC